EXHIBIT 1

Merchant & Gould

An Intellectual Property Law Firm

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September 14, 2009

Jennifer A. Albert **Goodwin Procter LLP** 901 New York Avenue NW Washington, DC 20001

Re:

ePlus, Inc. v. Lawson Software, Inc.

Case No.: 2:09-232

M&G No.: 16391.0001USZA

Dear Jennifer:

This letter follows our discussion and your letter dated September 10, 2009. As we discussed, Lawson produced product manuals last week. We have identified additional manuals that are being collected and will be produced tomorrow. We have also set up a laptop that contains a demo of the S3 software. The laptop will be sent to your attention on Wednesday. We expect to produce the M3 demo next week based on the fact that it is overseas.

As discussed, Lawson has collected documents from several custodians. The following list identifies the custodians from whom documents have been collected and are being processed.

- Nancy Anderson 1.
- Dale Christopherson 2.
- 3. Todd Dooner
- 4. Jeff Frank
- 5. Joel Grover
- Dean Hager 6.
- **Deb Hoitomt** 7.
- Lori Holman 8.
- 9. Leon Johnson
- Anna Kirsch 10.
- Keith Lohkamp 11.

Atlanta	Denver	Knoxville	Omaha	Minneapolis	Seattle	Washington DC
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- 12. MJ Martis
- 13. Irene Orf
- 14. Jill Richardson
- 15. Kimberly Ross
- 16. Joe Simpson
- 17. Mary Jo Tincher
- 18. Beth Weinberger

As we discussed, our production of electronic documents is based on searching keywords related to those documents. The following keywords were used to locate documents responsive to your requests.

6023683 or "6,203,689" or "683 Patent" "purchase order" and inventory 6055516 or "6,055,516" or "516 Patent" requisition 6505172 or "6,505,172" or "172 Patent" vendor and catalog supplier and catalog 5319542 or "5,319,542" or "542 Patent" "matching item" 5712989 or "5,712,989" or "989 Patent" "order list" Procure+ "selection protocol" "Supplier Portal" "cross reference" S3 "cross reference" and catalog "Procurement Suite" "Distribution Suite" "hit list" RSS or "Requisition Self Service" DDE "supply chain" Insight M3 procurement "Purchasing Module" Promega Fisher "E-Procurement Module" punchout RQ "drill down" PO AND Procure "Item Master" IC **PROC** concatenate **EPP** RQ **PUR** RQ10 **EPP RQSR** SAP IC or "inventory control" IC30 Ariba IBM AND Procure inventor Loral prototype "Fisher Scientific" "Patent Office" ProcureNet or "Procure Net" USPTO or PTO ePlus **EPO** (James or Jim) w/3 Johnson JPO RIMS **CIPO**

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TV/2 TV2 J-CON SABRE Gateway Gateway/DOS Gateway/2000 Gateway/MRO "Gateway 2000" "P.O. Writer" "prior art" invalid "NOVA DOS" MatKon conceive conception "public use" CSR sourcing catalog and inventory

requisition and "purchase order"

prosecution
assignment
lawsuit
infringe
Spencer
Brinkema
transcript
deposition
invention
"claim chart"
embodiment
royalty
valuation
RFP
SOW
competitor

competitor
"consulting partner"

financials

"license agreement"
"catalog loading"

Revenue

Lawson is also producing the marketing materials related to the supply chain management product line. That production will include information from Lawson's website, including the online product demo and information that is available by signup. The Lawson organizational chart has already been produced.

We are in the process of collecting requests for proposals, statements of work, license agreements, and service agreements. For those documents that are template agreements, Lawson will be producing samples with a list of customers who have entered those agreements.

Lawson will also supplement Interrogatory Nos. 2 and 4 by the end of this week. Lawson reserves the right to supplement and continue supplementing all of ePlus' requests as new information is discovered.

Your letter dated August 27, 2009, asserts that ePlus is asserting all claims in each of the three patents-in-suit against Lawson. Pursuant to Lawson's Interrogatory No. 1, Lawson requested that ePlus provide its infringement contentions with respect to each product ePlus believes infringes on any asserted claim of the patents in suit. ePlus objected to that Interrogatory on several grounds, including the objection that the Interrogatory was premature because Lawson has not yet produced documents.

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While Lawson contends ePlus' pre-suit investigation should have provided the basis for asserting each claim, Lawson agreed to collect the documents you requested and produce those by the end of this week. With the production of these documents, there is no reason for ePlus not to identify the claims at issue in this case. Please identify the claims that you plan to assert against Lawson by September 25, 2009. Additionally, please updated ePlus' response to Interrogatory No. 1 by September 30, 2009, based on the claims that you plan to assert at trial.

Sincerely,

William D. Schultz

WDS/kmd